

ERNEST GALVAN – 196065
KARA J. JANSSEN – 274762
ADRIENNE SPIEGEL - 330482
LUMA KHABBAZ - 351492
ROSEN BIEN GALVAN &
GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
Telephone: (415) 433-6830
Email: egalvan@rbgg.com
kjanssen@rbgg.com
aspiegel@rbgg.com
lkhabbaz@rbgg.com

SUSAN M. BEATY – 324048
CALIFORNIA COLLABORATIVE FOR
IMMIGRANT JUSTICE
1999 Harrison Street, Suite 1800
Oakland, California 94612-4700
Telephone: (510) 679-3674
Email: susan@ccijjustice.org

Attorneys for Plaintiffs

STEPHEN CHA-KIM*
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019-9710
Telephone: 212.836.8000
Email: stephen.cha-kim@arnoldporter.com

CARSON ANDERSON – 317308
ARNOLD & PORTER KAYE SCHOLER LLP
3000 El Camino Real
Five Palo Alto Square, Suite 500
Palo Alto, CA 94306-3807
Telephone: 650.319.4500
Email: carson.anderson@arnoldporter.com

OREN NIMNI* Mass. Bar No. 691821
AMARIS MONTES* Md. Bar No. 2112150205
D. DANGARAN *Mass. Bar No. 708195
RIGHTS BEHIND BARS
416 Florida Avenue N.W. #26152
Washington, D.C. 20001-0506
Telephone: (202) 455-4399
Email: oren@rightsbehindbars.org
amaris@rightsbehindbars.org
d@rightsbehindbars.org

*Admitted *pro hac vice*

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.; G.M.;
A.S.; and L.T., individuals on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, et al.,

Defendants.

Case No. 4:23-CV-04155-YGR

**DECLARATION OF CARSON D.
ANDERSON IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED REGARDING PORTIONS
OF PLAINTIFFS' REPLY POST-
EVIDENTIARY HEARING BRIEF**

1 I, Carson Dean Anderson, hereby declare as follows:

2 1. I am an attorney admitted to practice law in the State of California (SBN 317308).
3 I am a Senior Associate at the law firm of Arnold & Porter Kaye Scholer LLP and counsel for
4 Plaintiffs in the above captioned matter.

5 2. I submit this declaration in support of Plaintiffs' Administrative Motion To
6 Consider Whether Another Party's Material Should Be Sealed Regarding Portions Of Plaintiffs'
7 Reply Post-Evidentiary Hearing Brief. I have personal knowledge of the facts stated herein and,
8 if called as a witness, could and would testify competently thereto.

9 3. The highlighted portions of Plaintiffs' Reply Post-Evidentiary Hearing Brief at
10 6:10-12, 6:17, 10:12, and 10:6-11:1 refer to material that the Federal Defendants have filed under
11 seal in this matter, or is derived from such material.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
13 Bruno, California, on this 23rd day of February, 2024.

14
15
16 **ARNOLD & PORTER KAYE SCHOLER LLP**

17
18 By: /s/ Carson D. Anderson
Carson D. Anderson

19 *Attorneys for Plaintiffs*
20
21
22
23
24
25
26
27
28